

**South Carolina Department of Health and Environmental Control**  
**Compliance Agreement**  
**AREA 3: CHILD EVALUATION COMPLIANCE WORK PLAN**

**AREA OF NON-COMPLIANCE:** DHEC does not ensure that all infants and toddlers are evaluated in all 5 developmental areas in the required timeframe.

**BASELINE DATA:**

**1. CIMP Self-Assessment Report – December 2000:**

- a. Need to decrease waiting times for evaluations was noted; and
- b. Developmental domain assessments were not conducted on all infants and toddlers that were referred prior to the initial IFSP.

**2. OSEP Monitoring Report – Onsite Visit February 2002:**

- a. Evaluations and assessments were not completed in all five developmental areas;
- b. Outcomes on initial IFSP were limited to future referrals for further evaluation and assessment;
- c. Infants and toddlers were not evaluated in the areas of vision and hearing;
- d. Evaluations and assessments were not completed within the 45-day timeline;
- e. There were waiting lists for evaluations and assessments; and
- f. Shortages of providers in some areas affected completion of evaluations and assessments in a timely manner.

**3. BabyTrac Data:**

- a. Data indicates continued delays in meeting 45-day requirement – June 2003.

**OUTCOME:** DHEC will ensure that infants and toddlers receive timely comprehensive evaluations in all five developmental areas to enable the initial IFSP team meeting to be convened within 45 calendar days from referral.

**Goal 1:** DHEC will ensure that evaluations and assessments are completed in all five developmental areas – cognitive development, physical development, including vision and hearing, communication development, social or emotional development and adaptive development.

**Goal 2:** DHEC will ensure that infants and toddlers receive timely evaluations and assessments in order to enable the initial IFSP team meeting to be convened within 45 calendar days from referral and eliminate waiting lists for evaluations and assessments.

With prior written approval from OSEP, adjustments to the Activities to Reach Results column listed in this table may be made when necessary to support achievement of compliance outcomes within the required timelines. The Activities to Reach Results will be evaluated every six months to determine their effectiveness and any need for change. Any requests for changes or amendments will be submitted to OSEP in writing.

Objectives/Activities to Reach Results	Verification	Target Completion Date	Date Completed
<b>Objective EV-1:</b> Develop and implement a coordinated statewide set of strategies to address systemic problems in the 45-day evaluation/assessment process, through analysis of root causes of problems as identified through the monthly self-report data from BabyNet Service Coordinators.			
EV-1A. Compile and analyze 3 months of self-reported data from every BN Service Coordinator through September 2003 to determine extent and root causes of noncompliance in this area. Data shall include: <ul style="list-style-type: none"> <li>• Number of infants and toddlers with disabilities who were referred to Part C for evaluation and assessment;</li> <li>• Number of infants and toddlers who are waiting for evaluations and assessments in any of the five developmental areas within 45 days of referral;</li> <li>• Extent of the delay (i.e., the number of days past the 45 day timeline).</li> <li>• Number of additional infants and toddlers added to waiting list for evaluations and assessments during the reporting period.</li> <li>• Reasons for delay in evaluation/assessment including inadequate numbers of personnel in specific disciplines/BNCTs, and other factors including delays in report writing, scheduling IFSP meetings, and in referring for evaluation/assessments, etc.</li> </ul> (Findings: 2a, 2c, 2d, 2f)	Statewide report on root causes of compliance problems with evaluation/assessment process is submitted to OSEP.	October 31, 2003	
EV-1B. Based on the analysis of extent and root causes	Statewide strategies and plan for their	December 31, 2003	

Objectives/Activities to Reach Results	Verification	Target Completion Date	Date Completed
<p>at the State systems level, the local community level, personnel issues, and implementation practices, the DHEC, with advice from the South Carolina Interagency Coordinating Council Personnel Committee, will identify systemic statewide strategies to resolve compliance problems in this area. Particular attention will be paid to shortages of discipline-specific personnel within BNCTs as well as other causes including delays in evaluation report writing, timely referrals for evaluations and delays in scheduling the IFSP meeting. (Findings: 2a, 2b, 2c, 2d, 2e, 2f)</p>	<p>implementation is submitted to OSEP.</p>		
<p>EV-1C. Implement systemic statewide strategies as determined by the plan including development and implementation of fiscal contracts, training for staff involved as necessary, and analysis of the number of personnel available to determine if adequate. (Findings: 2a, 2b, 2c, 2d, 2e, 2f)</p>	<p>Documentation of implementation of strategies submitted to OSEP.</p>	<p>March 31, 2004</p>	
<p>EV-1D. Continue to evaluate progress in this area through BabyTrac-II reports and make adjustments as necessary until desired result is reached. (Findings: 2a, 2b, 2c, 2d, 2e, 2f)</p>	<p>Monthly reports from BabyTrac-II will be available for review to track improved compliance.</p>	<p>First report available by January 31, 2004 and monthly thereafter.</p>	
<p><b>Objective EV-2:</b> Ensure the development and implementation of individual BabyNet Coordination Child Evaluation Compliance Plans as a component of the overall BNCT Compliance Plan process.</p>			
<p>EV-2A Based upon data received in EV-1A, prepare data tables for each BNCT by county. Districts will be ranked according to the variables listed in the verification column. Each BN Coordination Team will demonstrate continuous improvement in ensuring all infants and toddlers receive timely evaluations and assessments, including vision and hearing within the 45-day timeline. Quarterly benchmarks (which shall be either a percentage or a numerical decrease from the</p>	<p>Data reports will be submitted to OSEP and disseminated to SC-ICC and BNCTs. In its quarterly report to OSEP, DHEC shall provide monthly summaries for each BNCT with a completed Compliance Plan that detail progress in meeting benchmarks. A narrative shall be included that details how DHEC has analyzed and responded to the data provided by each BNCT.</p>	<p>September 30, 2003</p>	

Objectives/Activities to Reach Results	Verification	Target Completion Date	Date Completed
<p>prior reporting period will be established for each BN Coordination Team and approved by OSEP). Data on each BNC team's progress in meeting the benchmarks shall be submitted to OSEP and incorporated into each respective BNCT Compliance Plan. Benchmarks must be established separately for those who were on a waiting list on August 31, 2003 and those who are identified after August 31, 2003. DHEC will monitor each BNCT to ensure that benchmarks are met and will intervene directly with individual BNCTs, as necessary. (Findings: 2a, 2b, 2c, 2d, 2e, 2f)</p>			
<p>EV-2B. Incorporate local infant and toddler evaluation improvement planning, including benchmarks, into overall BabyNet Coordination Team Compliance Plan Process under General Supervision Objectives GS-5. (Findings: 2a, 2b, 2c, 2d, 2e, 2f)</p> <p>Each BNCT will address local issues specific to the current evaluation and assessment process, additional funding and personnel needs, best practice models etc.</p>	<p>Compliance Plans submitted in accordance with GS-5 will include improvement strategies to address discrepancies in data in EV-1A.</p> <p>Benchmarks for the Target Group 1 (6 BNCTs) will be submitted to OSEP.</p> <p>Benchmarks for the Target Group 2 (6 BNCTs) will be submitted to OSEP.</p> <p>In its quarterly report to OSEP, DHEC shall provide monthly summaries for each BNCT with a completed Compliance Plan that detail progress in meeting benchmarks. A narrative shall be included that details how DHEC has analyzed and responded to the data provided by each BNCT.</p>	<p>Timelines as indicated in GS-5 target dates of completion.</p> <p>January 31, 2004</p> <p>June 30, 2004</p> <p>January 31, 2004 and quarterly progress reports thereafter.</p>	
<b>Objective EV-3: With parental consent, infants and toddlers being evaluated for eligibility will receive vision and hearing screenings.</b>			
<p>EV-3A. Develop vision and hearing screening policies and procedures. (Finding: 2c)</p>	<p>Vision and hearing screening policies/procedures submitted to OSEP.</p>	<p>October 31, 2003</p>	

Objectives/Activities to Reach Results	Verification	Target Completion Date	Date Completed
EV-3B. Develop and implement plan to train staff in implementation of vision and hearing screening policies/procedures. (Finding: 2c)	Training plan and documentation of completed training available for review.	January 31, 2004	
EV-3C. Continue to evaluate progress in this area through BabyTrac-II reports and data collected and analyzed in EV-1A. Make adjustments as necessary until desired result is reached. (Finding: 2c)	<p>BabyNet Coordination Teams to track and report monthly (see EV-1A) the:</p> <ul style="list-style-type: none"> <li>• Number of infants and toddlers not evaluated in the area of vision within 45 days from the date of referral and the number of additional children added to waiting list for vision evaluations during the reported period;</li> <li>• Number of children not evaluated in the area of hearing within 45 days from the date of referral and the number of additional children added to waiting list for hearing evaluations during the reported period.</li> </ul> <p>DHEC to report on data to OSEP quarterly. Continuous progress will be documented until, no later than three years from the date of the compliance agreement, the number of children not receiving timely vision and hearing evaluations is zero.</p>	First report available by March 31, 2004 and monthly thereafter.	